

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

RECEIVED

CALVIN JACKSON

Plaintiff(s),

vs.

Timothy A. Evans, as Chief Judge of the  
1st Circuit Court of Cook County,  
Carol L. Adams secretary IDHS  
Defendant(s).

Case No.

11-cv-02750

Judge Charles R. Norgle, Sr  
Magistrate Judge Maria Valdez

APR 26 2011  
4-26-11  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

**COMPLAINT FOR VIOLATION OF CONSTITUTIONAL RIGHTS**

*This form complaint is designed to help you, as a pro se plaintiff, state your case in a clear manner. Please read the directions and the numbered paragraphs carefully. Some paragraphs may not apply to you. You may cross out paragraphs that do not apply to you. All references to "plaintiff" and "defendant" are stated in the singular but will apply to more than one plaintiff or defendant if that is the nature of the case.*

- This is a claim for violation of plaintiff's civil rights as protected by the Constitution and laws of the United States under 42 U.S.C. §§ 1983, 1985, and 1986.
- The court has jurisdiction under 28 U.S.C. §§ 1343 and 1367.
- Plaintiff's full name is CALVIN JACKSON.

*If there are additional plaintiffs, fill in the above information as to the first-named plaintiff and complete the information for each additional plaintiff on an extra sheet.*

FILED  
5/27/2011  
MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT

4. Defendant, Timothy C. Evans, Timothy P. Murphy, Carl L. Adams, is  
(name, badge number if known)

☒ an officer or official employed by Circuit Court of Cook County;  
(department or agency of government)  
Illinois Department of Human Services or

☐ an individual not employed by a governmental entity.

*If there are additional defendants, fill in the above information as to the first-named defendant and complete the information for each additional defendant on an extra sheet.*

5. The municipality, township or county under whose authority defendant officer or official acted is COOK County. As to plaintiff's federal constitutional claims, the municipality, township or county is a defendant only if custom or policy allegations are made at paragraph 7 below.

6. On or about 7/16/10, at approximately 9 ☒ a.m. ☐ p.m.  
(month, day, year)

plaintiff was present in the municipality (or unincorporated area) of

COOK

Markham, in the County of COOK,

State of Illinois, at 16501 South Kedzie,  
(identify location as precisely as possible)

when defendant violated plaintiff's civil rights as follows (*Place X in each box that applies*):

- ☐ arrested or seized plaintiff without probable cause to believe that plaintiff had committed, was committing or was about to commit a crime;  
☐ searched plaintiff or his property without a warrant and without reasonable cause;  
☐ used excessive force upon plaintiff;  
☐ failed to intervene to protect plaintiff from violation of plaintiff's civil rights by one or more other defendants;  
☐ failed to provide plaintiff with needed medical care;  
☐ conspired together to violate one or more of plaintiff's civil rights;

☒

Other:

In prisoned for failure to pay child support because lack of an attorney and lack of fund to pay for one

7. Defendant officer or official acted pursuant to a custom or policy of defendant municipality, county or township, which custom or policy is the following: (*Leave blank if no custom or policy is alleged*): In prisonment of the defendment for violation of an order to pay child support despite not being able to afford an attorney or having one provided by the court

8. Plaintiff was charged with one or more crimes, specifically:

Contempt of court

9. (Place an X in the box that applies. If none applies, you may describe the criminal proceedings under "Other") The criminal proceedings

☒ are still pending.

☐ were terminated in favor of plaintiff in a manner indicating plaintiff was innocent.<sup>1</sup>

☐ Plaintiff was found guilty of one or more charges because defendant deprived me of a fair trial as

follows \_\_\_\_\_

☐ Other: \_\_\_\_\_

10. Plaintiff further alleges as follows: (Describe what happened that you believe supports your claims. To the extent possible, be specific as to your own actions and the actions of each defendant.)

I was jailed in 2009 for Contempt of court for not paying child support orders. I was brought back to court three times while in jail and each time never given a Lawyer to talk to about my case with and I couldn't afford to hire an attorney. I am continued to be brought before the court to make an agreement to stay out of jail and never given an Lawyer to work on my behalf. This continue process may result in my continued in incarceration with ever having access to a Lawyer in violation of my 6<sup>th</sup> Amendment right to Counsel.

<sup>1</sup>Examples of termination in favor of the plaintiff in a manner indicating plaintiff was innocent may include a judgment of not guilty, reversal of a conviction on direct appeal, expungement of the conviction, a voluntary dismissal (SOL) by the prosecutor, or a *nolle prosequi* order.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
11. Defendant acted knowingly, intentionally, willfully and maliciously.

12. As a result of defendant's conduct, plaintiff was injured as follows:

suffered 16 days of imprisonment and faces more days of imprisonment  
\_\_\_\_\_  
\_\_\_\_\_

13. Plaintiff asks that the case be tried by a jury. ☒ Yes ☐ No

14. Plaintiff also claims violation of rights that may be protected by the laws of Illinois, such as false arrest, assault, battery, false imprisonment, malicious prosecution, conspiracy, and/or any other claim that may be supported by the allegations of this complaint.

WHEREFORE, plaintiff asks for the following relief:

- A. Damages to compensate for all bodily harm, emotional harm, pain and suffering, loss of income, loss of enjoyment of life, property damage and any other injuries inflicted by defendant;
- B. ☒ (Place X in box if you are seeking punitive damages.) Punitive damages against the individual defendant; and
- C. Such injunctive, declaratory, or other relief as may be appropriate, including attorney's fees and reasonable expenses as authorized by 42 U.S.C. § 1988.

Plaintiff's signature: Calvin Jackson

Plaintiff's name (print clearly or type): \_\_\_\_\_

Plaintiff's mailing

address: 7256 S. Blackstone

City Chicago

State Ill

ZIP 60619

Plaintiff's telephone number: (773) 668-7939.

Plaintiff's email address (if you prefer to be contacted by email): CalvinDSackson1@hotmail.com

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15. Plaintiff has previously filed a case in this district. ☐ Yes

☒ No

*If yes, please list the cases below.*

*Any additional plaintiffs must sign the complaint and provide the same information as the first plaintiff. An additional signature page may be added.*